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March 25, 2024

**VIA ECF**

Hon. Edgardo Ramos  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

RE: *Valerie Haven v. Marlton Hotel Operating LLC, et al.*  
Case No. 1:23-CV-07854 (ER)  
Consent Letter Motion for Extension of Time

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Dear Judge Ramos,

We represent Plaintiff Valerie Haven in the above referenced matter and respectfully submit this consent letter motion to extend the Case Scheduling Order filed in this matter on November 30, 2023 [ECF Doc. 17], pursuant to F.R.C.P. 16(b)(4), and paragraph 1.E. of Your Honor's Individual Practices.

The parties have been working cooperatively to complete discovery in this matter, including setting numerous fact witness depositions to take place before the current April 1, 2024, deadline for the completion of non-expert depositions. Unfortunately, Plaintiff's deposition set for last Wednesday, March 20<sup>th</sup>, had to be adjourned due to defense counsel's illness requiring hospitalization. While counsel have been able to reset Plaintiff's deposition for Wednesday, March 27<sup>th</sup>, this delay, together with scheduling accommodations requested by defense witnesses, means the parties will be unable to complete non-expert witness depositions before April 1<sup>st</sup>.

Accordingly, Plaintiff respectfully requests that the Court extend the current Case Scheduling Order deadline for completing non-expert depositions by 30 days to May 1st. Plaintiff also respectfully requests that all deadlines after the non-expert deposition deadline also be extended by 30 days so that discovery can continue proceeding in an orderly manner. Attached to this letter motion is a proposed Revised Scheduling Order for Your Honor's consideration pursuant to paragraph 1.E. of Your Honor's Individual Practices.

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Defendants consent to this extension request. There have not been any prior requests to extend discovery in this matter. The parties thank Your Honor for your time and attention to this matter.

Respectfully submitted,  
KREINDLER & KREINDLER LLP

By: /s/ Vincent C. Lesch III  
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Vincent C. Lesch III

cc: Perry, Van Etten, Rozanski & Kutner  
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Encl.